

REMARKS

Claims 1-5, 25-27, and 29-31 were rejected in the present Office Action under 35 U.S.C. § 103(a) as allegedly unpatentable over Liebeck (U.S. Patent No. 999,375) in view of Linkletter (U.S. Patent No. 4,087,319); Claims 28 and 32-35 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Liebeck in view of Linkletter and in further view of Smook (Chapter 23 of Handbook for Pulp and Paper Technologists); Claims 1-3, 25 and 27 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Fuller (U.S. Patent No. 1,315,924). Also in the present Office Action, Claims 6-24 were indicated as allowed.

In this Amendment, Applicants have amended Claims 1-3, 25, and 29, and added Claims 36-39. Therefore, all Claims 1-39 are presently pending, of which Claims 1, 6, 25, 29, and 36 are independent claims with Claims 6-24 indicated as allowed by the Examiner. Applicants respectfully request reconsideration and withdrawal of the rejections of the remaining pending claims for the reasons discussed below.

Applicants respectfully submit that independent Claim 1 as amended is patentable over Liebeck in view of Linkletter for the following reasons. Claim 1 has been amended to more particularly point out and distinctly claim in pertinent part a method for directly forming and finishing a rolled paper web product comprising the steps of forming a paper web on a paper forming apparatus; continuously transferring the formed paper web to a plurality of conveyors positioned downstream from the forming apparatus; performing a converting step on the paper web as the paper web continuously advances on the conveyors; and winding the paper web into the rolled paper web product in a form substantially ready for packaging. Liebeck does not disclose each and every element of Claim 1.

As the Examiner acknowledged in the Office Action, Liebeck is unsupported between the last dryer cylinder and the perforator/slitter devices. Moreover, Liebeck has guide tapes (25), which are substantially different than conveyors.

Applicants respectfully submit that Linkletter does not rectify the deficiencies of Liebeck. According to the Office Action, Linkletter when applied to Liebeck would have made obvious to one of ordinary skill in the art at the time the invention was made to provide for continuous transfer and transport of the tissue web, as disclosed by Liebeck, from dryer to winder by means of an endless conveyor belt as taught by Linkletter to eliminate unsupported draws between processing equipment. However, neither Liebeck nor Linkletter, alone or in combination, disclose each and every element of amended Claim 1. For example, Linkletter does not advance a paper web continuously on conveyors. Therefore, Applicants respectfully submit that one skilled in the art, when applying Linkletter to Liebeck, would arrive at a solution that falls short of the amended Claim 1.

In view of the above, Applicants respectfully submit that the combination of the cited references does not render Claim 1 obvious, and Applicants respectfully request that the Examiner withdraw his rejection to Claim 1. Applicants further respectfully request that the Examiner indicate the allowability of Claim 1 and Claims 2-5 dependent thereon.

Applicants respectfully traverse the rejection of independent Claim 25 under 35 U.S.C. § 103(a) as allegedly unpatentable over Liebeck in view of Linkletter. Claim 25 has been amended to more particularly point out and distinctly claim in pertinent part a web manufacturing system for directly forming and finishing a web product comprising a web forming apparatus for forming and drying the web product; transfer means for transferring the formed and dried web product from the web forming apparatus; a conveyance system having a plurality of conveyors positioned downstream from the transfer means, at least one of the conveyors of the conveyance system configured to continuously receive at a standard web processing speed the formed and dried web product from the transfer means for transferring; a converting station for finishing the web as the web continuously advances on at least one of the conveyors of the conveyance system at the standard web processing speed; a winding element for winding the web into the web

product; and means for continuously supporting the web from after the step of transferring the web to at least one of the conveyors of the conveyance system to the step of winding the web into the web product. Liebeck does not disclose each and every element of Claim 25.

As noted above, the Examiner acknowledged that Liebeck is unsupported between the last dryer cylinder and the perforator/slitter devices. Applicants respectfully submit that Linkletter does not rectify the deficiencies of Liebeck. Neither Linkletter nor Liebeck, alone or in combination, teach each and every element of Claim 25 as amended. For example, Linkletter does not teach finishing a web as it continuously advances on at least one of a plurality of conveyors. Therefore, Applicants respectfully submit that the combination of the cited references does not render Claim 25 obvious, and Applicants respectfully request that the Examiner withdraw his rejection to Claim 25. Applicants further respectfully request that the Examiner indicate the allowability of Claim 25 and Claims 26-28 dependent thereon.

Applicants respectfully submit that independent Claim 29 as amended is patentable over Liebeck in view of Linkletter for the following reasons. Claim 29 has been amended to more particularly point out and distinctly claim in pertinent part a method for manufacturing and finishing an uncreped through-air dried web product from an aqueous suspension of fibers forming an endless wet web on a forming fabric, the method comprising the steps of: transferring the dried web from the dryer to a conveyor, the dryer and the conveyor configured to cooperate at substantially a single operating speed; continuously advancing the web on the conveyor to a second conveyor, at least one of the conveyor and the second conveyor configured to substantially support the web during a converting process; converting the web in the converting process; perforating the web with a perforator; and severing the perforated web with a severing device disposed proximate the perforator to form a finished web product. Liebeck does not disclose each and every element of Claim 29.

The Examiner acknowledged in the Office Action that Liebeck is unsupported between the last dryer cylinder and the perforator/slitter devices. Applicants respectfully submit that Linkletter does not rectify the deficiencies of Liebeck. Neither Linkletter nor Liebeck, alone or in combination, teach each and every element of Claim 29 as amended. For example, Linkletter does not teach at least one of the conveyor and the second conveyor configured to substantially support the web during a converting process. Therefore, Applicants respectfully submit that the combination of the cited references does not render Claim 29 obvious, and Applicants respectfully request that the Examiner withdraw his rejection to Claim 29. Applicants further respectfully request that the Examiner indicate the allowability of Claim 29 and Claims 30-35 dependent thereon.

Applicants respectfully traverse the rejection of independent Claim 1 under 35 U.S.C. § 103(a) as allegedly unpatentable over Fuller. Claim 1 has been amended to more particularly point out and distinctly claim in pertinent part a method for directly forming and finishing a rolled paper web product comprising the steps of forming a paper web on a paper forming apparatus; continuously transferring the formed paper web to a plurality of conveyors positioned downstream from the forming apparatus; performing a converting step on the paper web as the paper web continuously advances on the conveyors; and winding the paper web into the rolled paper web product in a form substantially ready for packaging. Fuller does not disclose each and every element of Claim 1.

As the Examiner concedes, sheet stacking as taught by Fuller is not the same as winding. Moreover, by requiring that cellucotton must not be pressed and that all pressure and couch rollers have been dispensed with, Fuller clearly teaches away from amended Claim 1. Compare col. 2, lines 85-87 of Fuller and Applicants' Specification, page 9, lines 18-23 and page 10, lines 1-5.

Further, although the Examiner states that it would have been obvious to one skilled in the art that sheeting is a converting operation equivalent in function to winding or folding the web into final product form, the Examiner does not cite supporting prior art. In re Zurko, 258 F.3d 1379, 1386, 59 U.S.P.Q.2d 1693, 1697 (Fed. Cir. 2001) (stating that in patentability determinations limitations of claimed inventions cannot be met with general conclusions about 'basic knowledge' or 'common sense' to one of ordinary skill in the art, but must be found in concrete evidence of record). See also In re Sang Su Lee, 277 F.3d 1338, 61 U.S.P.Q. 2d 1430 (Fed. Cir. 2002) (stating that the determination of patentability on the ground of obviousness requires the Examiner to articulate and place on the record that which he relies on to assert to be general knowledge to negate patentability).

Applicants respectfully submit that one of ordinary skill, when presented with only Fuller could only have rectified the deficiencies of the cited reference using impermissible hindsight afforded by Claim 1 or by modifying Fuller away from its intended purpose. Therefore, Applicants respectfully submit that Fuller does not render Claim 1 obvious, and Applicants respectfully request that the Examiner withdraw his rejection to Claim 1. Applicants further respectfully request that the Examiner indicate the allowability of Claim 1 and Claims 2-3 dependent thereon.

Applicants respectfully traverse the rejection of independent Claim 25 under 35 U.S.C. § 103(a) as allegedly unpatentable over Fuller. Claim 25 has been amended to more particularly point out and distinctly claim in pertinent part a web manufacturing system for directly forming and finishing a web product comprising a web forming apparatus for forming and drying the web product; transfer means for transferring the formed and dried web product from the web forming apparatus; a conveyance system having a plurality of conveyors positioned downstream from the transfer means, at least one of the conveyors of the conveyance system configured to continuously receive at a standard web processing speed the formed and dried web product from

the transfer means for transferring; a converting station for finishing the web as the web continuously advances on at least one of the conveyors of the conveyance system at the standard web processing speed; a winding element for winding the web into the web product; and means for continuously supporting the web from after the step of transferring the web to at least one of the conveyors of the conveyance system to the step of winding the web into the web product.

Fuller does not disclose each and every element of Claim 25.

As the Examiner concedes, sheet stacking as taught by Fuller is not the same as winding. Moreover, by requiring that cellucotton must not be pressed and that all pressure and couch rollers have been dispensed with, Fuller clearly teaches away from amended Claim 25. See col. 2, lines 85-87 of Fuller.

Also, as noted above, the Examiner does not cite prior art showing that sheeting is a converting operation equivalent in function to winding or folding the web into final product form. In re Zurko, 258 F.3d at 1386. Applicants respectfully submit that without more, the deficiencies of Fuller could only have been rectified using impermissible hindsight provided by the present invention or by modifying Fuller away from its intended purpose. Therefore, Applicants respectfully request that the Examiner remove his rejections to independent Claim 25 as amended and Claims 26-28 dependent thereon.

With respect to the allowance of Claims 6-24, the Examiner noted in the Office Action under "Allowable Subject Matter" that there is no suggestion in the prior art to combine off-line converting operations at different running speeds with the two-conveyor belt support system used in manufacturing the tissue web. Under MPEP §1302 and 37 C.F.R. §1.104, Applicants respectfully submit that independent Claim 6, and Claims 7-24 dependent thereon, are not limited to two conveyors operating at different running speeds. For instance, in Applicants' Specification at page 12, lines 10-11, it should be noted that conveyors 24a, 24b, and 24c may operate at different speeds as required.

Since the cited references differ significantly from the present claims, Applicants respectfully submit that independent Claims 1, 25, and 29 as amended, and claims dependent thereon, are patentable over the cited references alone or in combination. Therefore, the Examiner is respectfully requested to withdraw his rejections and indicate the allowability of the pending claims 1-5 and 25-35 in addition to previously allowed Claims 6-24.

Further, Applicants respectfully submit that new Claims 36-39 are also patentable over the cited references, which do not disclose alone or in combination the subject matter of independent Claim 36, for example. Therefore, the Applicants respectfully request the allowance of Claim 36, and Claims 37-39 dependent thereon.

If the Examiner has any questions upon consideration of this Amendment, Applicants invite the Examiner to contact the undersigned at the number appearing below.

Respectfully submitted,

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